INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

G. F. Munich Welding Company
211 Eastern Blvd.
Jeffersonville, Indiana 47130

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 019-14026-00075	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 19, 2002 Expiration Date: August 19, 2007

TABLE OF CONTENTS

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
C.12 Monitoring Methods [326 IAC 3] [40 CFR 60][40 CFR 63]
C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4, 5]
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4, 5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: Surface Coating

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-3]
D.1.2 Hazardous Air Pollutants [326 IAC 2-8-4]
D.1.3 Particulate Matter (PM_{10}) [326 IAC 2-8-4]
D.1.4 Particulate Matter (PM) [326 IAC 6-1-2]
D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)
D.1.8 VOC Emissions
D.1.9 Hazardous Air Pollutants (HAPs)
D.1.10 Hazardous Air Pollutants (HAPs) Emissions
D.1.11 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements
D.1.14 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Sand and Mechanical Blasting

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 PM_{10} Emission Limitation [326 IAC 2-8-4]
D.2.2 Particulate Matter (PM) [326 IAC 6-1-2(a)]
D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary steel tank manufacturing source.

Authorized Individual:	Vice President
Source Address:	211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address:	211 Eastern Blvd., Jeffersonville, Indiana 47130
General Source Phone Number:	812 - 282 - 0488
SIC Code:	3441 and 3449
County Location:	Clark
Source Location Status:	Moderate Nonattainment for ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) spray paint room, known as EU1, equipped with dry filters for PM control, capacity: 0.18 tanks per hour, 4.0 beams per hour.

(b) One (1) sand blast room, known as EU2, equipped with a water wash control system for PM control, capacity: 21,200 pounds per hour.

(c) One (1) mechanical blaster, known as EU3, equipped with a baghouse for PM control capacity: 25,000 pounds per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2, 326 IAC 8-3-5]

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6-1]

(c) Structural steel fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-1]

(d) One (1) sand storage silo with particulate matter emissions less than 5 pounds per hour of 25 pounds per day. [326 IAC 6-1]

(e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(h) Paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary or source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1)incorporated as originally stated,

(2)revised, or

(3)deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM,

OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,

Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ approval.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date post-marked on the envelope or certified mail receipt, or affixed by the shipper on the private

shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Surface Coating

(a) One (1) spray paint room, known as EU1, equipped with dry filters for PM control, capacity: 0.18 tanks per hour, 4.0 beams per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total volatile organic compound (VOC) delivered to the coating applicators at the one (1) spray paint room (EU1), plus the VOC used for cleanup, shall use less than a total of 99 tons per consecutive twelve (12) month period, rolled on a monthly basis. This will limit the VOC emissions from the entire source, including the degreaser from Condition D.3.2, to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) The worst case single HAP delivered to the coating applicators at the one (1) spray paint room (EU1), plus amount of that HAP used for cleanup and the amount of a single HAP used in the degreaser in Condition D.3.2, shall use less than 10.0 tons per twelve (12) consecutive month period, rolled on a monthly basis. This is equivalent to emissions of less than 10.0 tons per twelve (12) consecutive month period of a single HAP. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) The combination of HAPs delivered to the coating applicators at the one (1) spray paint room (EU1), plus the total HAPs used for cleanup and the amount of HAPs used in the degreaser in Condition D.3.2, shall use less than a total of 25.0 tons per twelve (12) consecutive month period, rolled on a monthly basis. This is equivalent to emissions of less than 25.0 tons per twelve (12) consecutive month period of any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter (PM) and(PM_{10}) [326 IAC 2-8-4]

(a) The solids delivered to the applicators at the one (1) spray paint room (EU1) shall use less than 4,000 tons per consecutive twelve (12) month period, rolled on a monthly basis. This total is based on a seventy-five percent (75%) transfer efficiency, and a ninety-three (93%) control efficiency. This limit is equivalent to PM_{10} emissions of less than 70.0 tons per year from the one (1) spray paint room, when operating the dry filters at all times when the spray room is in operation. When combined with the blast cleaning activities of Condition D.2.1 and the flame cutting, steel fabrication and sand storage activities of Condition D.3.1, this limit is less than 100 tons per year of PM_{10} from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-7 are not applicable.

(b) As a result of this PM_{10} limit, and since PM is equal to PM_{10} at all facilities at the source, the PM emissions from the entire source will also be limited to less than 100 tons per year, and the requirements of 326 IAC 2-2, Prevention of Significant Deterioration are also not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a), the one (1) spray paint room (EU1) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in

excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

(b) The requirement from FESOP 019-6034-00075, issued December 9, 1996, Condition D.1.4, which states that the paint room (EU1) shall comply with 326 IAC 6-3-2(c): $E = 4.10P^{0.67}$, where E = rate of emissions in pounds per hour and P= process weight in tons per hour, has not been included in the renewal. This source is located in Clark County, which is listed in 326 IAC 6-1-7. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1 (Nonattainment area particulate limitations) are applicable to the one (1) spray paint room (EU1). The requirements of 326 IAC 6-1 supercede the requirements of 326 IAC 6-3-2, and Condition D.1.4 of FESOP 019-6034-00075, issued December 9, 1996, is hereby rescinded.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of the one (1) spray paint room (EU1), used for coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, for forced warm air dried coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC usage and content limitations contained in Conditions D.1.1 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.9 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.10 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and combination of HAPs usage for the twelve (12) month period.

D.1.11 Particulate Matter (PM)

In order to comply with Conditions D.1.3 and D.1.4, the dry filters for PM control shall be in operation at all times when the one (1) spray paint room (EU1) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the one (1) spray paint room (EU1) stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.5, and the HAP usage limits and HAP emission limits established in Condition D.1.2.

(1) The amount and VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC, total solids, individual HAP and total HAP usage for each month;

(5) The weight of VOCs, PM and PM_{10}, individual HAPs and total HAPs emitted for each compliance period;

(b) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Sand and Mechanical Blasting

(b) One (1) sand blast room, known as EU2, equipped with a water wash control system for PM control, capacity: 21,200 pounds per hour.

(c) One (1) mechanical blaster, known as EU3, equipped with a baghouse for PM control capacity: 25,000 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 PM_{10} Emission Limitation [326 IAC 2-8-4]

(a) The PM_{10} emissions from the sand blast room, known as EU2, shall not exceed 4.00 pounds per hour, equivalent to 17.5 tons per year per, and less than 100 tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) The PM_{10} emissions from the mechanical blaster, known as EU3, shall not exceed 0.34 pounds per hour, equivalent to 1.50 tons per year per, and less than 100 tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.2.2 Particulate Matter (PM) [326 IAC 6-1-2(a)]

(a) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), the sand blast room, known as EU2, and the mechanical blaster, known as EU3, shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

(b) The requirement from FESOP 019-6034-00075, issued December 9, 1996, Condition D.2.2, which states that pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the sand blasting operation shall not exceed 8.22 pounds per hour, and the particulate matter emissions from the mechanical blasting operation shall not exceed 0.42 pounds per hour, has not been included in the renewal. This source is located in Clark County, which is listed in 326 IAC 6-1-7. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1 (Nonattainment area particulate limitations) are applicable to the sand blast room, known as EU2, and the mechanical blaster, known as EU3. The requirements of 326 IAC 6-1 supercede the requirements of 326 IAC 6-3-2, and Condition D.2.2 of FESOP 019-6034-00075, issued December 9, 1996, is hereby rescinded.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

(a) Pursuant to FESOP 019-6034-00075, issued December 9, 1996, and in order to comply with conditions D.2.1 and D.2.2, water wash control system for PM control shall be in operation and control emissions from the sand blast room, known as EU2, at all times that the sand blast room is in operation.

(b) Pursuant to FESOP 019-6034-00075, issued December 9, 1996, and in order to comply with conditions D.2.1 and D.2.2, the baghouse for PM control shall be in operation and control emissions from the mechanical blaster, known as EU3, at all times that the mechanical blaster is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

(a) Visible emission notations of the sand blast room (EU2) and mechanical blaster (EU3) stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.6 Water Wash Control System Inspection

(a) The water wash control system for PM control shall be inspected at least once per shift when the water wash system is in operation. The system should be inspected for leaks and the water reservoir topped off as necessary.

(b) An inspection shall be performed within the last month of each calendar quarter of the water wash system. Defective part(s) shall be replaced, and the system shall be drained, cleaned and refilled. A record shall be kept of the results of the inspection.

D.2.7 Water Wash Control System Failure Detection

In the event that a water wash system failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C).

D.2.8 Baghouse Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the mechanical blaster (EU3), at least once per shift when the mechanical blaster is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.9 Baghouse Inspections

An inspection shall be performed within the last month of each calender quarter of all bags controlling the mechanical blaster (EU3), when venting to the atmosphere. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the sand blast room (EU2) and mechanical blaster (EU3) stack exhausts, once per shift.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:

(1) Records of the once per shift water level inspections during normal operation when venting to the atmosphere.

(2) Records of the quarterly inspections and cleanings.

(c) To document compliance with Condition D.2.8, the Permittee shall maintain the following:

(1) Records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere.

(2) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(c) Structural steel fabrication activities using 80 tons or less of welding consumables.

(d) One (1) sand storage silo with particulate matter emissions less than 5 pounds per hour of 25 pounds per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the welding, structural steel fabrication and sand storage facilities shall be limited to 0.03 grain per dry standard cubic foot of outlet air.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs existing as of July 1, 1990, and located in Clark County, shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility existing as of July 1, 1990, and located in Clark County, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: G. F. Munich Welding Company
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
FESOP No.: F 019-14026-00075

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: G. F. Munich Welding Company
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
FESOP No.: F 019-14026-00075

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: G. F. Munich Welding Company
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
FESOP No.: F 019-14026-00075
Facility: Spray paint room (EU1)
Parameter: VOC delivered to the applicator
Limit: Less than 99 tons per consecutive 12 month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: G. F. Munich Welding Company
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
FESOP No.: F 019-14026-00075
Facility: Spray paint room (EU1)
Parameter: HAPs delivered to the applicator
Limit: Less than 10 tons per consecutive 12 month period of any single HAP
Less than 25 tons per consecutive 12 month period of any combination of HAPs

YEAR: _____

Month	Combination of HAPS (tons)	Combination of HAPS (tons)	Combination of HAPS (tons)
	This Month	Previous 11 Months	12 Month Total

Month	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: G. F. Munich Welding Company
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
FESOP No.: F 019-14026-00075
Facility: Spray paint room (EU1)
Parameter: Total solids delivered to the applicators
Limit: No more than 4,000 tons per consecutive twelve (12) month period

YEAR: _____

Month	Solids (tons)	Solids (tons)	Solids (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: G. F. Munich Welding Company
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
FESOP No.: F 019-14026-00075

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**G. F. Munich Welding Company**
Source Location:	**211 Eastern Blvd., Jeffersonville, Indiana 47130**
County:	**Clark**
SIC Code:	**3441 and 3449**
Operation Permit No.:	**F 019-14026-00075**
Permit Reviewer:	**Patrick T. Brennan**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from G. F. Munich Welding Company relating to the operation of a steel tank manufacturing source. G. F. Munich Welding Company was issued FESOP F 019-6034, on December 9, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) spray paint room, known as EU1, equipped with dry filters for PM control, capacity: 0.18 tanks per hour, 4.0 beams per hour.

(b) One (1) sand blast room, known as EU2, equipped with a water wash control system for PM control, capacity: 21,200 pounds per hour.

(c) One (1) mechanical blaster, known as EU3, equipped with a baghouse for PM control capacity: 25,000 pounds per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2, 326 IAC 8-3-5]

(b) The following equipment related to manufacturing activities not resulting in the emission of

HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6-1]

(c) Structural steel fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-1]

(d) One (1) sand storage silo with particulate matter emissions less than 5 pounds per hour of 25 pounds per day. [326 IAC 6-1]

(e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(h) Paved and unpaved roads and parking lots with public access.

Existing Approvals

(a) FESOP 019-6034-00075, issued on December 9, 1996, and expires on December 9, 2001.

(b) MMF 019-10363-00075, issued on March 8, 1999.

All conditions from previous approvals were incorporated into this FESOP except the following:

FESOP 019-6034-00075, issued on December 9, 1996; and expiring on December 9, 2001, and MMF 019-10363-00075, issued on March 8, 1999

D.1.4 Particulate Matter Overspray (spray paint room)
The paint room shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows:

$E = 4.10 P^{0.67}$, where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour. For process weights in excess of sixty thousand (60,000) pounds per hour, $E = 55.0 P^{0.11} - 40$.

D.2.2 Particulate Matter
That pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the sand blasting operation shall not exceed 8.22 pounds per hour, and the particulate matter emissions from the mechanical blasting operation shall not exceed 0.42 pounds per hour.

Reason not incorporated: This source is located in Clark County, which is listed in 326 IAC 6-1-7. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1 (Nonattainment area particulate limitations) are applicable to the spray paint room (EU1), the sand blast room (EU2) and the mechanical blaster (EU3). The requirements of 326 IAC 6-1 supercede the requirements of 326 IAC 6-3-2, and Conditions D.1.4 and D.2.2 from FESOP 019-6034-00075, issued on December 9, 1996, are rescinded in this proposed FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on March 6, 2001. Additional information was received on July 24, 2001 and January 25, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document, pages 1 and 2 of 2, for detailed VOC and HAPs emissions calculations from surface coating. See page 13 of this document for detailed calculations of PM emissions from the sand blasting and mechanical blasting processes. For the purposes of FESOP, it is assumed that all PM = $PM_{10.}$

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	**Unrestricted Potential Emissions** (tons/year)
PM	299
PM_{10}	299
SO_2	0.013
VOC	169
CO	1.84
NO_X	2.19

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/year)
Xylene	63.7
Ethylbenzene	39.8
Glycol Ethers	15.4
Dimethylbenzene	53.3
MIBK	8.41
TOTAL	181

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM_{10} are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 9, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F 019-6034-00075; issued on December 9, 1996).

	Potential to Emit After Issuance (tons/year)						
Process/ Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Surface Coating (EU1)	70.0	70.0	-	Less than 99	-	-	Single less than 10 Total less than 25
Sand Blasting (EU2)	17.5	17.5	-	-	-	-	-
Blast Cleaning (EU3)	1.50	1.50	-	-	-	-	-
Insignificant Activities	10.0	10.0	0.120	1.0	1.84	2.19	neg
Total PTE After Issuance	99.0	Less than 100	0.120	Less than 100	1.84	2.19	Single less than 10 Total less than 25

The PM_{10} limit has been apportioned between the surface coating and blast cleaning operations in proportion to the magnitude of their uncontrolled PM_{10} emissions. The PM_{10} limit for surface coating will be enforced through a limitation of solids delivered to the applicators.

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Clark County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. Because the source has a degreasing operation that is an insignificant activity, 40 CFR Part 60, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) could be applicable. However, because the degreasing operation uses no halogenated HAP solvents, 40 CFR Part 60, Subpart T, is not applicable.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The source was constructed in 1967 with unrestricted potentials to emit of PM and PM_{10} greater than 250 tons per year. However, because the source was constructed prior to August 7, 1977, it did not undergo PSD review. In addition, the potential to emit of PM_{10} shall be limited to less than 100 tons per year by this permit. Since all PM from the source is equal to PM_{10} , this also limits PM to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

326 IAC 2-3 (Emission Offset)

The source was modified in 1993 to add the mechanical blasting unit. At that time, Clark County was non-attainment for total suspended particulates (TSP). Because the unrestricted PM emissions from the mechanical blasting unit were less than 25 tons per year, the source did not undergo emission offset review.

Clark County was designated as attainment for ozone on November 23, 2001, and is now an attainment county for all criteria pollutants. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) are not applicable.

326 IAC 2-4.1-1 (New Source Toxics Control)

The source was in existence prior to July 27, 1997. Therefore the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit of more than ten (10) tons per year of VOC in Clark County. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM_{10} and VOC shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

PM_{10},VOC and HAPs are the only pollutants requiring a Section D condition to meet the FESOP limits. The specific limits for each process are listed in the following table.

	Summary of FESOP Limits				
Process/ Emission Unit	PM_{10} FESOP Limit (tons/year)	PM_{10} FESOP Limit (lb/hr)	Controlled PM_{10} Emissions (lb/hr)	VOC FESOP Limit (tons/year)	HAPs FESOP Limit (tons/year)
Surface Coating (EU1)	70.0	16.0	3.65	Less than 99	Single less than 10 Total less than 25
Sand Blasting (EU2)	17.5	4.00	0.130	-	-
Blast Cleaning (EU3)	1.50	0.34	0.001	-	-

The dry filters shall be in operation at all times the surface coating process is in operation, the water wash control system shall be in operation at all times the sand blasting process is in operation, and the baghouse shall be in operation at all times the blast cleaning process is in operation, in order to comply with these limits.

326 IAC 5-1 (Opacity Limitations)

This source is located in the Jeffersonville Township. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1 (Nonattainment area particulate limitations)

This source is located in Clark County, which is listed in 326 IAC 6-1-7, but the source is not specifically listed in 326 IAC 6-1-17. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1-2 are applicable.

(a) Pursuant to 326 IAC 6-1-2(a), the one (1) paint room (EU1) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The dry filters shall be in operation at all times the one (1) paint room is in operation, in order to comply with this limit.

(b) Pursuant to 326 IAC 6-1-2(a), the one (1) sand blast room (UE2) equipped with a water wash control system at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The water wash control system shall be in operation at all times the sand blast room is in operation, in order to comply with this limit.

(c) Pursuant to 326 IAC 6-1-2(a), the one (1) mechanical blast unit (EU3) equipped with a baghouse at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The baghouse shall be in operation at all times the mechanical blast unit is in operation, in order to comply with this limit.

(d) Pursuant to 326 IAC 6-1-2(a), the one (1) insignificant structural steel and tank fabrication process at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray paint room shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray paint room is in compliance with this requirement.

326 IAC 8-3-2 (Cold Cleaner Degreaser Operation and Control)

The one (1) cold cleaning and degreasing operation, which is an insignificant activity, was existing as of January 1, 1980, and is located in Clark County. However, because potential VOC emissions from this facility are less than 100 tons per year, it its not subject to the requirements of 326 IAC 8-3-2.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The one (1) cold cleaning and degreasing operation, which is an insignificant activity, was existing as of July 1, 1990, is located in Clark County, and does not have remote solvent reservoirs. Therefore, it its subject to the requirements of 326 IAC 8-3-5.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent

volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

Testing is not required for VOC emissions, because the emission calculations were base on MSDS sheets. Testing is not required for the PM_{10} facilities because the control devices for PM_{10} all exceed 90%, while control efficiencies of only 70% are required to meet the FESOP limits.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance require-

ments are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

A new compliance requirement for parametric monitoring of the pressure drop on the mechanical blasting baghouse (EU3) was incorporated into this FESOP. In addition, all compliance requirements from previous approvals were incorporated into this FESOP. The source is subject to the following compliance monitoring requirements:

(a) The spray paint room (EU1) has applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray paint room (EU1) stack while the room is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(b) The sand blast room (EU2) has applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the sand blast room (EU2) water wash control system stack shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit

shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) The water wash control system for PM control shall be inspected at least once per shift when the water wash system is in operation. The system should be inspected for leaks and the water reservoir topped off as necessary.

(3) An inspection shall be performed each calendar quarter of the water wash system. Defective part(s) shall be replaced, and the system shall be drained, cleaned and refilled. A record shall be kept of the results of the inspection.

(c) The mechanical blaster (EU3) has applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the mechanical blaster (EU3) baghouse stack shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the mechanical blaster (EU3), at least once per shift when the mechanical blaster is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(3) An inspection shall be performed each calender quarter of all bags controlling the mechanical blaster (EU3), when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(4) In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down

immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this proposed permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this proposed permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the dry filters, baghouse and water wash system must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Area Particulate Limitations), 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this steel tank manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F 019-14026-00075.

Emissions Calculations

1. PM Emissions From Sand Blasting (EU2)

PM emissions from sand blasting were calculated from information supplied by the permittee on form CE-01 as follows:

$$\frac{15{,}960\ ft^3}{min} \times \frac{0.00095\ gr}{ft^3} \times \frac{60\ min}{hr} \times \frac{1\ lb}{7{,}000\ gr} \times \frac{8{,}760\ hr}{yr} \times \frac{ton}{2{,}000\ lb} \approx 0.569\ tons/yr\ PM$$

Where: Grain loading: 0.00095 gr/ft^3
Air flow rate: 15,950 acfm

Assuming a wet collector efficiency of 99%, PM emissions before controls are

0.569 TPY / 0.01 = 56.9 TPY uncontrolled PM emission

2. PM Emissions From Mechanical Blasting (EU3)

PM emissions from mechanical blasting were calculated from information supplied by the permittee on form CE-01 as follows:

$$\frac{4{,}525\ ft^3}{min} \times \frac{0.00155\ gr}{ft^3} \times \frac{60\ min}{hr} \times \frac{1\ lb}{7{,}000\ gr} \times \frac{8{,}760\ hr}{yr} \times \frac{ton}{2{,}000\ lb} \approx 0.004\ tons/yr\ PM$$

Where: Grain loading: 0.00155 gr/ft^3
Air flow rate: 4,525 acfm

Assuming a baghouse efficiency of 99.9%, PM emissions before controls are

0.004 TPY / 0.001 = 4.39 TPY uncontrolled PM emission

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: G.F. Munich Welding Company, Inc.
Address City IN Zip: 211 Eastern Boulevard, Jeffersonville, IN 47130
FESOP#: F019-14026
Plt ID#: 019-00075
Reviewer: Patrick T. Brennan
Date: March 6, 2001

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Carboline 890																	
Part A	11.70	10.0%	0.0%	10.0%	0.0%	90.00%	25.000	0.18	1.00	1.2	1.2	5.27	126.36	23.06	51.89	1.30	75%
Part B	13.40	17.0%	0.0%	17.0%	0.0%	83.00%	25.000	0.18	1.00	2.3	2.3	10.25	246.02	44.90	54.80	2.74	75%
Interlac 260																	
Interlac 260	13.20	18.9%	0.0%	18.9%	0.0%	81.10%	0.227	4.00	1.00	2.49	2.49	2.27	54.37	9.92	10.64	3.08	75%
L-626 Solvent	6.93	100.0%	50.0%	50.0%	0.0%	0.00%	0.023	4.00	1.00	3.5	3.5	0.32	7.65	1.40	0.00	ERR	75%
Tnemec																	
HB Epoxyline II	15.58	17.1%	0.0%	17.1%	0.0%	82.90%	25.000	0.18	1.00	2.66	2.66	11.97	287.39	52.45	63.66	3.21	75%
HB Epoxyline II Converter	11.48	16.6%	0.0%	16.6%	0.0%	83.40%	25.000	0.18	1.00	1.9	1.9	8.57	205.69	37.54	47.18	2.28	75%
											TOTAL:	**38.6**	**927**	**169**	**228**		

Control Efficiency		Controlled	Controlled	Controlled	Controlled	
VOC	PM	VOC pounds	VOC pounds	VOC	Particulate	
	0.93	per hour	per day	tons/yr	tons/yr	
Controlled Total:		**38.6**	**927**	**169**	**16.0**	

Controlled Emissions due to Surface Coating Operations and Controls

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: G.F. Munich Welding Company, Inc.
Address City IN Zip: 211 Eastern Boulevard, Jeffersonville, IN 47130
FESOP#: F019-14026
Plt ID#: 019-00075
Reviewer: Patrick T. Brennan
Date: March 6, 2001

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % Glycol Ethers	Weight % Dimethylbenzene	Weight % MIBK	Xylene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Dimethylbenzene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Total HAPS (tons/yr)
Carboline 890														
Part A	11.70	25.000	0.18	10.00%	5.00%	0.00%	0.00%	0.00%	23.06	11.53	0.00	0.00	0.00	
Part B	13.40	25.000	0.18	10.00%	5.00%	0.00%	0.00%	0.00%	26.41	13.21	0.00	0.00	0.00	
Interlac 260														
Interlac 260	13.20	0.227	4.00	25.00%	10.00%	0.00%	0.00%	0.00%	13.12	5.25	0.00	0.00	0.00	
L-626 Solvent	6.93	0.023	4.00	40.00%	10.00%	0.00%	0.00%	0.00%	1.12	0.28	0.00	0.00	0.00	
Tnemec														
HB Epoxyline II	15.58	25.000	0.18	0.00%	2.18%	5.00%	9.09%	0.00%	0.00	6.69	15.35	27.91	0.00	
HB Epoxyline II Converter	11.48	25.000	0.18	0.00%	1.25%	0.00%	11.21%	3.72%	0.00	2.83	0.00	25.36	8.41	

Total Potential HAPS Emissions

TOTALS:	**(tons/yr):**	**63.71**	**39.79**	**15.35**	**53.27**	**8.41**	**181**
	(lb/hr):	**14.56**	**9.09**	**3.51**	**12.17**	**1.92**	
	(g/sec):	**1.83**	**1.15**	**0.442**	**1.534**	**0.242**	

Note: The weight percent HAPs for some coatings is expressed as a range (i.e. 5 - 10%) on the MSDS sheets.
The maximum value of the range has been used in the PTE calculations. Accordingly, the Total HAPs PTE exceeds the Total VOC PTE on page 1.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs